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as Special Administrator of the
Estate of Demetrios A. Dalacas

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

ALLIED WORLD SPECIALTY INSURANCE
COMPANY f/k/a DARWIN NATIONAL
ASSURANCE COMPANY and ALLIED
WORLD INSURANCE COMPANY,

Plaintiffs,

vs.

LISA M. LEE, as Special Administrator of the
ESTATE OF DEMETRIOS A. DALACAS,
ESQ., ROBERT O McMASTER, as Special
Administrator of the ESTATE OF
DEMETRIOS A. DALACAS, ESQ.,
DEMETRIOS A. DALACAS, ESQ., P.C., a
Nevada professional corporation; JOYCE
SIRIANNI, and RYAN MCCLARAN,

Defendants.

CASE NO.: 2:21-cv-00078-JCM-EJY

JOINT MOTION FOR
EXTENSION OF TIME FOR
DEFENDANTS JOYCE SIRIANNI
AND LISA M. LEE, AS SPECIAL
ADMINISTRATOR OF THE
ESTATE OF DEMETRIOS A.
DALACAS TO FILE THEIR
RESPONSIVE PLEADING TO
PLAINTIFFS' COMPLAINT FOR
DECLARATORY JUDGMENT
AND MONEY JUDGMENT

(Second Request)

Plaintiffs Allied World Specialty Insurance Company f/k/a Darwin National Assurance Company and Allied World Insurance Company ("Plaintiffs") and Defendants Joyce Sirianni and Lisa M. Lee, as Special Administrator of the Estate of Demetrios A. Dalacas ("Defendants") hereby file their *Joint Motion for Extension of Time for Defendants Joyce Sirianni and Lisa M. Lee, as Special Administrator of the Estate of*



1 *Demetrios A. Dalacas* to file their Responsive Pleading to Plaintiffs' Complaint for
 2 Declaratory Relief and Monetary Judgment. Plaintiffs and Defendants jointly and
 3 respectfully request this Court to extend the deadline for Defendants to file their
 4 responsive pleading to Plaintiffs' Complaint for Declaratory Judgment and Money
 5 Judgment twenty-one (21) days from Friday, April 16, 2021 to Friday, May 7, 2021. This
 6 is Defendants' second request for extension of time to file their responsive pleading.
 7 Plaintiffs and Defendants hereby submit this joint motion in accordance with LR 7-1.

8 Over the course of the last several weeks, Defendants' undersigned counsel has
 9 spent a significant amount of time preparing a substantive mediation brief for a complex
 10 insurance bad faith matter, *Volungis, et al. v. Liberty Mutual Fire Insurance Company*,
 11 Case No. 2:17-cv-2247 JCM (VCF). Defendants' undersigned counsel simultaneously
 12 devoted substantial time preparing a substantive motion for summary judgment
 13 addressing five (5) distinct issues in a complex insurance bad faith matter, *Arlitz v.*
 14 *GEICO Casualty Company*, Case No. 2:19-cv-00743-RFB-DJA. During this same time
 15 period, Defendants' undersigned counsel purchased a home in March and had to address
 16 several unforeseen issues that arose during escrow that forced him to take some time
 17 away from the office. This additional extension of time will allow Defendants' counsel
 18 to prepare a comprehensive responsive pleading fully addressing the allegations set
 19 forth in Plaintiffs' Complaint for Declaratory Judgment and Money Judgment.

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“When an act may or must be done within a specified time, the court may, for good cause, extend the time” *Burns v. Davis*, Case No. 2:19-cv-00218-RFB-BNW, 2021 U.S. Dist. LEXIS 3749, at *7 (D. Nev. Jan. 8, 2021) (*quoting* Fed. R. Civ. P. 6). Based on the foregoing, Plaintiffs and Defendants jointly and respectfully request this Court to **GRANT** the foregoing Motion and extend the deadline for Defendants to file their responsive pleading to Plaintiffs’ Complaint for Declaratory Judgment and Money Judgment twenty-one (21) days from Friday, April 16, 2021 to Friday, May 7, 2021.

DATED this 16th day of April, 2021.

DATED this 16th day of April, 2021.

**WILSON, ELSER, MOSKOWITZ,
EDELMAN & DICKER LLP**

PRINCE LAW GROUP

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*Joyce Sirianni and Lisa M. Lee, as Special
Administrator of the Estate of Demetrios
A. Dalacas, Esq.*

IT IS SO ORDERED.


U.S. MAGISTRATE JUDGE

Dated: April 16, 2021